

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE HEALTH AFFAIRS

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August 19, 2004

MEMORANDUM FOR HIPAA SECURITY SERVICE REPRESENTATIVES

SUBJECT: USE OF HIPAA BASICS

The purpose of this memorandum is to communicate throughout the Military Health System (MHS) policy concerning the use of HIPAA Basics during implementation of the HIPAA Security Rule.

The MHS HIPAA Security Integrated Project Team (IPT) is responsible for developing and executing a strategy for the implementation and maintenance of the requirements prescribed in the Health Insurance Portability and Accountability Act (HIPAA) Security Rule throughout the Department of Defense (DoD). The MHS HIPAA Security IPT has representatives from the Office of the Army Surgeon General, Office of the Navy Surgeon General, Office of the Air Force Surgeon General, US Coast Guard, and various TMA Directorates.

The MHS HIPAA Security IPT's Project Management Plan provides a comprehensive framework for implementing and institutionalizing the HIPAA Security Rule requirements that will ensure the security of electronic individually identifiable health information. This framework takes the form of a vision, goals, objectives, initiatives and tasks. One of those initiatives, "Establish an Oversight and Compliance Program that is able to report on the state of MHS HIPAA Security at any point in time", reflects our legal responsibility to ensure and report on compliance with HIPAA throughout the MHS. The MHS must be able to establish an initial baseline and track progress toward compliance with the HIPAA security requirements.

The TRICARE Management Activity (TMA) Privacy Office has provided the HIPAA Basics tool for military treatment facilities (MTFs) and the services to track and document compliance with both the HIPAA Privacy and Security Rules. Training in the management and use of this tool has been provided to MTF and service personnel. On April 27, 2004, the Service representatives to the MHS HIPAA Security IPT unilaterally agreed to mandate the use of HIPAA Basics by the MTFs during the HIPAA Security

implementation phase in order to facilitate uniform documentation of compliance throughout the MHS.

Please distribute this information to your Military Treatment Facilities and Support offices to ensure uniform compliance documentation and reporting through the use of the HIPAA Basics tool.

If further information is needed on this issue, please contact the Privacy Office at PrivacyMail@tma.osd.mil.

Samuel P. Jenkins

Privacy Officer

TMA Privacy Office